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November 1, 2004

RECEIVED

NOV - 1 2004

Federal Communications Commission  
Office of Secretary

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: CC Docket 94-102  
E911 Quarterly Report  
Rural Cellular Corporation for itself and its affiliates

Dear Ms. Dortch:

On behalf of Rural Cellular Corporation and its subsidiaries<sup>1</sup> (collectively, "RCC") there is submitted herewith a report of the status of the company's implementation of E911 services.

RCC is a digital wireless carrier operating cellular radiotelephone and/or personal communications services in multiple markets. RCC is a Tier II carrier as defined in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 2002 FCC LEXIS 3638, FCC 02-210 (2002) ("*Phase II Stay Order*"). This report is submitted in compliance with the terms of the *Phase II Stay Order*.

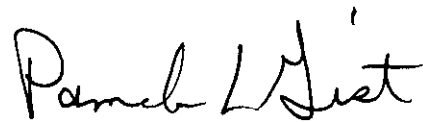
Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein, in the narrative report and attached spreadsheet, be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

<sup>1/</sup> This report pertains to the following companies which are wholly-owned subsidiaries of Rural Cellular Corporation and are authorized by the FCC to provide broadband Commercial Mobile Radio Service: RCC Atlantic Licenses, Inc., RCC Minnesota, Inc., Wireless Alliance, LLC and TLA Spectrum, L.L.C.

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Federal Communications Commission  
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Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

A handwritten signature in black ink that reads "Pamela L. Gist". The signature is written in a cursive style with a large, stylized "P" and "G".

Pamela L. Gist

# **Rural Cellular Corporation**

## **E911 Implementation Report**

### **November 1st, 2004**

#### **Summary**

Rural Cellular Corporation ("Rural Cellular") operates wireless networks in rural communities in 14 states covering approximately 5.9 million people. Our service area encompasses 34 rural service areas (RSAs), 3 metropolitan statistical areas (MSAs) and a few partitioned basic trading areas (BTAs). The Rural Cellular networks utilize predominately TDMA/analog technology. Rural Cellular has started to deploy some GSM and CDMA overlays in several markets.

#### **Phase I**

Rural Cellular continues to make progress in its efforts to deploy Phase I location capability services. For details on these deployments, please refer to the spreadsheet set forth in the Appendix to this report.

#### **Phase II**

Rural Cellular also continues to make progress on its Phase II requests. Rural Cellular continues to have concerns about the performance of network-based solutions in rural markets.

In addition to the network-based solution provided by Grayson Wireless, Rural Cellular also has begun to deploy an alternative network-based solution provided by Polaris Wireless. Rural Cellular will deploy the Polaris Wireless solutions in certain TDMA and GSM networks. Rural Cellular has elected a handset-based solution for all of its CDMA markets.

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[illegible]

[illegible]

[illegible]

[illegible]



### **CERTIFICATE OF SERVICE**

I, Linda J. Evans, an employee in the law offices of Lukas, Nace Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of November, 2004, sent by U.S. Mail, a copy of the foregoing E911 Quarterly Report of Rural Cellular Corporation (for itself and its affiliates), filed with the Commission on November 1, 2004, to the following:

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Wireless Telecommunications Bureau  
Federal Communications Commission  
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Washington, DC 20554

David Solomon, Chief  
Enforcement Bureau  
Federal Communications Commission  
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D'wana Terry, Chief  
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Linda J. Evans